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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 VANESSA LIBRERA,

Case No.: 2:18-cv-00873-JCM-CWH

11 Plaintiff,

**STIPULATION AND ORDER TO
CONTINUE TRIAL (FIRST REQUEST)**

12 vs.

13 ALBERTSON'S, LLC d/b/a
14 ALBERTSON'S; ALBERTSON'S STORES
15 SUB LLC; ABS NV-O LLC; DOES 1
16 through 100 and ROE CORPORATIONS 1
17 through 100, inclusive,

18 Defendants.

19 Plaintiff VANESSA LIBRERA, by and through her attorneys of record, FARHAN R.
20 NAQVI and ELIZABETH E. COATS of NAQVI INJURY LAW, and Defendants
21 ALBERTSON'S LLC d/b/a ALBERTSON'S, ALBERTSON'S STORES SUB LLC, and ABS
22 NV-O LLC STATE FARM, by and through their attorney of record, JACK P. BURDEN, ESQ.
23 of BACKUS, CARRANZA & BURDEN, submit this **STIPULATION AND ORDER TO**
24 **CONTINUE TRIAL (FIRST REQUEST)** pursuant Rules 6(b) and 26(f) of the Federal Rules
25 of Civil Procedure and Local Rules 6-1 and 26-4 for the Court's consideration:
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27
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1 Good cause exists for the continuance. Mostly significantly, as jury trials are currently
2 postponed in this Court pursuant to the Third Amended Temporary General Order 2020-03, and
3 pursuant to the request of the Courtroom Deputy to Honorable James C. Mahan, the parties
4 request a continuance of the trial and all related deadlines in this matter. Additionally, the
5 parties recently participated in a private mediation on December 7, 2020, and are currently
6 working to resolve this matter. Therefore, a continuance will also help to facilitate the parties'
7 settlement efforts.

8
9 The current trial date is January 25, 2021, with the Calendar Call scheduled for January
10 20, 2021 at 1:30 p.m. The parties agree that the trial and all associated deadlines, including that
11 related to motions in limine, be continued 120-days or as soon thereafter as this matter may be
12 heard. This Stipulation to Continue Trial is made in good faith and not for purposes of undue
13 delay.

14 DATED this 14th day of December, 2020.

15
16 NAQVI INJURY LAW

17
18 /s/ Elizabeth E. Coats

19 FARHAN R. NAQVI
20 Nevada Bar No. 8589
21 ELIZABETH E. COATS
22 Nevada Bar No. 12350
23 9500 W. Flamingo Rd., Suite 104
24 Las Vegas, Nevada 89147
25 *Counsel for Plaintiff*

26 DATED this 14th day of December, 2020.

27 BACKUS, CARRAZNA & BURDEN

28 /s/ Jack P. Burden

29 JACK P. BURDEN, ESQ.
30 Nevada Bar No. 6918
31 3050 South Durango Drive
32 Las Vegas, Nevada 89117
33 *Counsel for Defendants*

34 IT IS SO ORDERED:

35 
36 UNITED STATES DISTRICT JUDGE,

37 December 14, 2020
38 DATED:

39 IT IS ORDERED that calendar call currently scheduled for 1/20/2021, is CONTINUED to
40 8/18/2021, at 1:30 PM in courtroom 6A before Judge James C. Mahan.

41 IT IS FURTHER ORDERED that the trial currently scheduled for 1/25/2021, is
42 CONTINUED to 8/23/2021, at 9:00 AM in courtroom 6A before Judge James C. Mahan.

